

# EXHIBIT 3

April 29, 2025

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1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN FRANCISCO DIVISION

4 IN RE: UBER TECHNOLOGIES, INC., )  
5 PASSENGER SEXUAL ASSAULT ) Case No. 3:23-md-03084-CRB  
6 LITIGATION )  
7 -----

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SAN FRANCISCO - UNLIMITED JURISDICTION  
10 -----

11 COORDINATION PROCEEDING SPECIAL )  
12 TITLE (Rule 3.550) ) Case No. CJC-21-005188  
13 )  
14 IN RE: UBER RIDESHARE CASES )  
15 -----

16 \*\*\*HIGHLY CONFIDENTIAL UNDER PROTECTIVE ORDER\*\*\*  
17 VIDEO-RECORDED DEPOSITION OF  
18 HENRY (GUS) FULDNER  
19 VOLUME III  
20 PAGES 595 TO 679

21 APRIL 29, 2025  
22 3:42 P.M.

23 555 California Street, Suite 2900  
24 San Francisco, California

25 REPORTED BY:  
Dawn A. Stark  
CSR No. 7847

April 29, 2025

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1 second?

2 THE VIDEOGRAPHER: Going off the record at  
3 4:18 P.M.

4 (Remarks outside the record.)

5 THE VIDEOGRAPHER: And we're back on the record  
6 at 4:19 P.M.

7 MS. LONDON: All right. I'm going to hand you  
8 what's been marked as Exhibit 679 (indicating).

9 (Deposition Exhibit No. 679 was marked.)

10 THE WITNESS: (Reviewing document.)

11 MS. LONDON: All right.

12 Q. And Mr. Fuldner, this is, for the record,  
13 Bates No. 001101535. This is a chat between  
14 Tracey Breeden and Carley Lake on December 16th of 2019  
15 (indicating).

16 Do you see that at the top?

17 A. (Witness reviewing document.)

18 Yes.

19 Q. All right. And Tracey Breeden -- can you just  
20 -- can you remind the jury who Tracey Breeden is?

21 A. Tracey was the leader of women's -- women's  
22 safety.

23 That's roughly -- roughly her title.

24 Q. Okay. And who's Carley?

25 A. Carley was in the -- her role is related to

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## REPORTER'S CERTIFICATE

I, Dawn A. Stark, a Certified Shorthand Reporter, do hereby certify:

That the foregoing proceedings were taken before me at the time and place therein set forth, at which time the witness was put under oath by me;

That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were there after transcribed;

That a review of the transcript by the deponent was requested;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct.

Dated: May 1, 2025



Dawn A. Stark, CSR No. 7847